

Subj: **For Tomorrow's Initial Engineering Review**
Date: 4/17/2006 8:27:47 A.M. Pacific Daylight Time
From: slichten@enviroservices.com
To: **FX-6 Personal Privacy**

Good Morning Ed!

Rather than a long winded phone call, I thought I'd send a long winded email - just to give you a head's up regarding tomorrow's initial hazardous waste treatment tank system evaluation and what to expect. Also - I wanted to get some information from you regarding your air quality permits and required plans (see the end of this email). I'm around all day today and tomorrow morning - and we'll see you at 2 pm tomorrow.

There will be two engineers performing the initial assessment, Hugh Davis and Oscar Malkhoo. Hugh will be evaluating the seismic safety aspects of the treatment system, and Oscar will be evaluating all other aspects (tank integrity, fitness for treating/containing the materials in the tanks, piping system integrity, secondary containment integrity, etc.). They'll be taking a bunch of measurements and looking inside the tanks. We should need no more than an hour or two on site. Richard Kallman may also be there to observe the engineers inspection.

As we discussed earlier, I anticipate there will be some recommended/required upgrades necessary to obtain the certification - these most likely will include additional seismic bracing (bolting or otherwise securing the tanks to the ground, bracing of piping and bracing of tanks, etc.), repair/patching of the secondary containment coating where it is thin or cracked, the possible replacement of the settling tank (depends on the condition - it was hard to see before it was cleaned out). Oscar will also do some calculations of the secondary containment capacity - to verify it will hold 110% of the volume of the largest tank or container as well as 24 hours of a 25 year storm (because it is outside)... something like 5 or so inches of rainfall.

They'll give you a list of these recommendations and will be able to prepare and certify the certification report after the recommendations (corrections) are made (and they field verify those after you inform us that the upgrades are completed). If you need to start the system back up to treat your backlog of waste - that's fine... but I would think you'll have to shut it down and clean it a bit before the contractors recoat and/or do whatever other upgrades may be recommended.

As I mentioned to you - now that you are reusing the treated water (rather than evaporating it), I should be able to get you out of the Tiered Permit program (though the tank certifications are still required). What I need to show is that you are recycling a significant amount of the wastes treated (more than 50%). So if you treat 500 gallons of chrome-laden acid wastes per month (appx. 5,000 lbs or so), we need to show that at least 360 - 400 gallons of treated waste water are reused on site (~3,000 lbs). Once you start the treatment system back up, I'll need you to keep a record of A) how much waste acid/chrome waste is treated per batch (gallons or pounds) and the dates of treatment; B) amount of chrome sludge shipped off site in the past 6 months (we can look at your manifests for that); and C) how much water you reuse back into the plating baths (gallons or pounds) and on what frequency. Once I have all that, I'll do the calculations and complete the required exemption paperwork for you. I've reviewed this with the fire department and they said if the numbers are ok - the exemption is fine with them.

For your air quality compliance (what a fun and exciting class that was.....) - could I pick up from you tomorrow when I'm there:

- copies of all your air permits (for the scrubber/air pollution control system) and all of your plating tanks
- a copy of your original Compliance Plan (was required to be submitted back by 2/1/2004) and the initial compliance status report (also required by 2/1/04). If you do not have any of these or can not locate them - just let me know.
- Any Operation and Maintenance Plan for the plating tanks and air pollution control system (required by the Rule 1469). If you do not have any of these or can not locate them - just let me know.
- If conducted - a copy of any source test of the air pollution control system.

That's it. Please call if you have any questions - I'll see you at 2 tomorrow, Ed.

Thanks!!

Steve

--
Steven M. Lichten
President
ESCI EnviroServices, Inc.
4401 Atlantic Avenue; Suite 200
Long Beach, CA 90807

562-984-2079
714-256-4812 (fax)

FX-6 Personal Privacy

ELECTRONIC CHROME AND GRINDING CO. INC.

Draft Work Plan for Hazardous Waste Tank Certification

| Target Date for Certification | May 1, 2006 | |
|---|---|-----------------------------------|
| | | Date / Comments |
| Information/Documentation Required | <ul style="list-style-type: none"> ➤ Process Flow Diagram of treatment system ➤ System operational procedures (including high level controls, emergency shut offs) ➤ Records of installation, repair ➤ Equipment specifications (tanks, piping, coatings, valves) – including materials of construction, age, | |
| Known Required Maintenance/Repairs Prior to Pre-certification Engineer Inspection | <ul style="list-style-type: none"> ➤ Thorough cleaning/ pressure washing of final settling tank ➤ Cleaning/washing of entire system and equipment (not including acid/chrome stripping tank) | <p>3-4 weeks</p> <p>3-4 weeks</p> |
| Known Required Upgrades or Repairs | <ul style="list-style-type: none"> ➤ Secondary containment area must be recoated (current visible cracks/gaps in concrete and/or coating) ➤ Re-securing (seismic restraint) of equipment after re-coating) ➤ Labeling/marketing of all tanks and piping | 4 weeks |
| Post Inspection Activities | <ul style="list-style-type: none"> ➤ Identification of any additional required/ recommended repairs or upgrades ➤ Scheduling upgrades/ repairs | |
| Certification | <ul style="list-style-type: none"> ➤ Final engineering inspection following additional repairs or upgrades ➤ Submission of certification documentation | |